

BEFORE THE STATE BOARD OF MEDICAL EXAMINERS  
STATE OF OKLAHOMA

STATE OF OKLAHOMA, )  
 )  
Plaintiff, )  
 )  
-vs- )  
 )  
MAURICE L. PETER, JR., M.D., )  
 )  
Defendant )

RECEIVED  
MAR 15 1979

STATE BOARD  
MEDICAL EXAMINERS

TO: DR. H. B. TATE, SECRETARY,  
STATE BOARD OF MEDICAL EXAMINERS,  
STATE OF OKLAHOMA  
5104 NORTH FRANCIS, SUITE C  
OKLAHOMA CITY, OKLAHOMA 73118

COMPLAINT

Comes now Ted Hagstrom, Inspector for the State Board of Medical Examiners, Oklahoma City, Oklahoma, being first duly sworn upon oath, and states:

1. That Maurice L. Peter, Jr., M.D. holding Oklahoma Medical License Number 7123, is charged with unprofessional conduct, to wit: violation of the Oklahoma Medical Practice Act, 59 O.S. 1978 Supp., § 509, more specifically subsections (5) and (12) as follows:

"(5) Habitual intemperance or the habitual use of habit-forming drugs."

"(12) The writing of false or fictitious prescriptions for any drug or narcotic declared by the laws of Oklahoma to be Controlled or Narcotic Drugs."

2. That Dr. Peter is further charged with unprofessional conduct in that his acts constitute a violation of Rule 29 of the Rules and Regulations of the Board of Medical Examiners, more specifically Rule 29, Subsection (c), to wit:

"(29) The Board has the right to refuse or revoke a license or certificate for unprofessional conduct. In addition to the acts defined as "Unprofessional Conduct" in 59 O.S. 1971, Section 509, as amended, the following acts shall be considered as "Unprofessional Conduct":

"(c) The habitual or excessive use of any drug which impairs the ability to practice medicine with reasonable skill and safety to the patient."

3. That during the months of October, November, and December of 1978, and January of 1979, Dr. Peter has been habitually using Tussend, a Controlled and Dangerous Substance, and that such act constitutes habitual use of a habit-forming drug.

4. That on or about January 6, 1979, Dr. Peter presented a false and fictitious prescription for Tussend at the Skaggs-Albertson Store. Said prescription was written by Dr. Peter to Bradley Bowers, a fictitious person.

5. That Dr. Peter has previously been before this Board for similar violation of the Medical Practice Act in June of 1969. The five-year probationary term imposed by the Board has elapsed and Dr. Peter is now the holder of an unrevoked and unrestricted license to practice medicine and surgery in the State of Oklahoma.

6. That upon proof of the above cited facts, Complainant prays this Board to take such action as is authorized by law and as this Board deems necessary including revocation or suspension of the license to practice medicine and surgery in the State of Oklahoma.

Ted Hagstrom  
Complainant

Subscribed and sworn to before me this 13<sup>th</sup> day of March, 1979.

Linda C. Campbell  
Notary Public

My Commission Expires: February 2, 1980